

1 SHOOK, HARDY & BACON LLP  
2 B. Trent Webb, Esq. (*pro hac vice*)  
Eric Buresh, Esq. (*pro hac vice*)  
2555 Grand Boulevard  
3 Kansas City, Missouri 64108-2613  
Telephone: (816) 474-6550  
4 Facsimile: (816) 421-5547  
[bwebb@shb.com](mailto:bwebb@shb.com)  
[eburesh@shb.com](mailto:eburesh@shb.com)

5  
6 Robert H. Reckers, Esq. (*pro hac vice*)  
7 600 Travis Street, Suite 1600  
Houston, Texas 77002  
8 Telephone: (713) 227-8008  
9 Facsimile: (731) 227-9508  
[rreckers@shb.com](mailto:rreckers@shb.com)

10 GREENBERG TRAURIG  
Mark G. Tratos, Esq. (Nevada Bar No. 1086)  
Brandon Roos, Esq. (Nevada Bar No. 7888)  
Leslie Godfrey, Esq. (Nevada Bar No. 10229)  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, NV 89169  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
[tratosm@gtlaw.com](mailto:tratosm@gtlaw.com)  
[roosb@gtlaw.com](mailto:roosb@gtlaw.com)  
[godfreyl@gtlaw.com](mailto:godfreyl@gtlaw.com)

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20 Attorneys for Defendants  
RIMINI STREET, INC. and SETH RAVIN

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28 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

21 ORACLE USA, INC., a Colorado corporation;  
22 ORACLE AMERICA, INC., a Delaware  
corporation; and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC. , a Nevada corporation;  
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO PERMIT DEFENDANTS  
TO FILE UNDER SEAL  
DEFENDANTS' EMERGENCY  
MOTION FOR PROTECTIVE ORDER  
REGARDING CUSTOMER  
DEPOSITIONS AND EXHIBIT A TO  
THE DECLARATION OF ERIC  
BURESH**

1                   **I.                  INTRODUCTION**

2                   Defendants Rimini Street, Inc., and Seth Ravin (collectively, “Defendants”) respectfully  
3 request that the Court order the Clerk of the Court to file the following documents under seal:

- 4                   1. The unredacted version of Defendants’ Emergency Motion for Protective Order  
5                   Regarding Customer Depositions;  
6                   2. The unredacted version of Exhibit A to the Declaration of Eric Buresh in Support of  
7                   Defendants’ Emergency Motion for Protective Order Regarding Customer  
8                   Depositions;

9                   Placeholders for these documents were lodged with the Court on November 7, 2011. This  
10 request is made pursuant to Federal Rules of Civil Procedure 5.2 and 26(c) and the Stipulated  
11 Protective Order entered by the Court on May 21, 2010 [Docket No. 55] (“Protective Order”).

12                   **II.                ARGUMENT**

13                   Parties requesting to file documents under seal may overcome the presumption of public  
14 access by showing of good cause under Rule 26(c). “The law . . . gives district courts broad latitude  
15 to grant protective orders to prevent disclosure of materials for many types of information, including,  
16 but not limited to, trade secrets or other confidential research, development, or commercial  
17 information. *See Fed. R. Civ. P. 26(c)(7).*” *Phillips ex rel. Estates of Byrd v. Gen. Motors Corp.*,  
18 307 F.3d 1206, 1211 (9th Cir. 2002).

19                   Good cause exists for filing the above listed documents under seal. They have been  
20 designated as Confidential or Highly Confidential or they contain content that has been designated as  
21 Confidential or Highly Confidential under the terms of the Protective Order. By openly filing the  
22 remaining exhibits and documents that do not require confidentiality without seal, Defendants’  
23 request is narrowly tailored. Because the above listed documents contain information designated as  
24 either “Confidential” or “Highly Confidential—Attorney Eyes Only,” good cause exists to permit a  
25 sealing order. *See, e.g., Pacific Gas and Elec. Co. v. Lynch*, 216 F. Supp. 2d 1016, 1027 (N.D. Cal.  
26 2002).

### **III. CONCLUSION**

For the foregoing reasons, Defendants respectfully request that the Court find that good cause exists to file under seal Defendants' Emergency Motion for Protective Order Regarding Customer Depositions and Exhibit A to the Declaration of Eric Buresh in Support of Defendants' Emergency Motion for Protective Order Regarding Customer Depositions. A Proposed Order is submitted with this Motion.

DATED: November 7, 2011 SHOOK, HARDY & BACON

By: /s/ Eric Buresh  
Eric Buresh, Esq.  
Attorney for Defendants  
Rimini Street, Inc. and Seth Ravin